



U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue NW
Washington, DC 20530

September 7, 2018

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: *State of New York v. U.S. Dep't of Commerce*, No. 18-cv-2921 (JMF)
N.Y. Immigration Coalition v. U.S. Dep't of Commerce, No. 18-cv-5025 (JMF)

Dear Judge Furman:

Defendants respectfully request an additional two days, until September 11, 2018, to respond to Plaintiffs' sixth letter motion to compel production of documents, 18-cv-2921, ECF No. 299; 18-cv-5025, ECF No. 123. Plaintiffs have consented to this request. The reason for this request is that Defendants have been reviewing and considering the discretionary production of part or all of many of the thirty-two documents at issue in Plaintiffs' motion, none of which had been specifically identified to Defendants until the letter motion was filed. Defendants intend to make such a discretionary release shortly, but were unable to finalize this production today. The forthcoming production will moot many of the claims raised in Plaintiffs' letter motion and thereby streamline the issues for the Court. As a result, Defendants are unable to complete their opposition to Plaintiffs' motion until after that production.

Respectfully submitted,

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